

BAKER BOTTS L.L.P.

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Counsel for Defendants
Chicago Bridge & Iron Company N.V.,
Philip Asherman, Ron Ballschmiede and
Westley Stockton

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE CHICAGO BRIDGE & IRON)	CASE NO. 1:17-CV-1580 Hon. Lorna Schofield
COMPANY N.V. SECURITIES)	
LITIGATION)	
)	

**MEMORANDUM OF LAW IN SUPPORT OF DEFENDANTS'
MOTION IN LIMINE NO. 11**

Defendants Chicago Bridge & Iron Co. N.V. ("CB&I"), Philip K. Asherman, Ronald A. Ballschmiede, and Westley S. Stockton submit this Memorandum of Law in support of their Motion *in Limine* No. 11 to preclude any non-relevant statements, exchanges, instructions to witnesses not to answer questions, or objections by counsel during depositions, and any reference to or mention of any objections made during discovery or any other discovery disputes.

Statements and objections by counsel are not evidence and are not relevant, and any possible relevance is substantially outweighed by the dangers of prejudice and confusion of the issues. FED. R. EVID. 402, 403.

Dated: December 13, 2021

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ David D. Sterling

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